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*Attorney for Defendant
Wine Bridge Imports, LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, the parties, Plaintiff Blackbird Vineyards, LLC
2 and Defendants Turkovich Family Wines, LLC and Wine Bridge Imports, Inc., hereby stipulate to
3 extend the time for Defendants to respond to Plaintiff's complaint and to continue the initial case
4 management conference currently scheduled for August 7, 2018, and in support thereof, state as follows:

5 1. On May 9, 2018, Plaintiff filed Case No. 4:18-cv-02724-KAW against Defendants.

6 2. By order dated May 9, 2018 (ECF No. 5), the Court set an initial case management
7 conference at 1:30 PM on August 7, 2018.

8 3. Plaintiff served its summons and complaint on Defendant Turkovich Family Wines, LLC
9 on May 17, 2018 and on Defendant Wine Bridge Imports, Inc. on May 22, 2018.

10 4. Stipulations to enlarge the time to file responses to Plaintiff's complaint were filed on
11 June 5 and 6, 2018 (ECF Nos. 13 and 14), extending the time for Defendants to file their responses to
12 Plaintiff's complaint to July 9, 2018.

13 5. The parties have conferred and stipulate that, in order to allow Defendants to further
14 evaluate Plaintiff's claims and to enable the parties to continue discussions regarding potential
15 resolution of the above-referenced action, the time for Defendants to file their responses to Plaintiff's
16 complaint should be extended by 30 days, specifically, from July 9, 2018 to August 8, 2018, and the
17 initial case management conference should be continued from August 7, 2018 to September 4, 2018.

18 6. Other than the date of the initial case management conference, the parties' stipulation will
19 not alter the date of any other event or deadline already fixed by Court order.

20 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that
21 Defendants will have until August 8, 2018 to respond to Plaintiff's complaint. The parties further
22 respectfully request that the initial case management conference be continued to September 4, 2018.

23 **SO STIPULATED.**

24 DATED: July 9, 2018

Daniel A. Reidy

26 /s/ Daniel A. Reidy

27 Daniel A. Reidy

28 Attorney for

BLACKBIRD VINEYARDS, LLC

STIPULATION TO ENLARGE TIME TO FILE RESPONSE TO COMPLAINT AND TO
CONTINUE INITIAL CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER

1
2 DATED: July 9, 2018

Robert J. Ward

4 */s/ Robert J. Ward*
5 Robert J. Ward

6 Attorney for
TURKOVICH FAMILY WINES, LLC

7
8 DATED: July 9, 2018

Lizbeth L. Hasse

11 */s/ Lizbeth Hasse*
12 Lizbeth L. Hasse

13 Attorney for
WINE BRIDGE IMPORTS, INC.

14
15 **SIGNATURE ATTESTATION**

16 I am an ECF User whose identification and password are being used to file the foregoing
17 document. In compliance with Civil Local Rule 5-1, I hereby attest that the signatories indicated above
18 via a conformed signature have concurred in this filing.

19
20 DATED: July 9, 2018

Lizbeth Hasse

23 */s/ Lizbeth Hasse*
24 Lizbeth Hasse

25 Attorney for
WINE BRIDGE IMPORTS, INC.

26
27 STIPULATION TO ENLARGE TIME TO FILE RESPONSE TO COMPLAINT AND TO
28 CONTINUE INITIAL CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER

1 **[PROPOSED] ORDER AS MODIFIED**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendants are to answer or otherwise
3 respond to Plaintiff's complaint by August 8, 2018. The initial case management conference will be
4 held on September 11, 2018 at 1:30 PM. The parties shall file a joint case management conference
5 statement seven days prior to the conference.

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7 DATED: July 10, 2018

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10 PRESIDING JUDGE

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